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June 26, 2025

Hon. Peggy Kuo
U.S. Magistrate Judge
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Wang v. Chung Fat Supermarket Inc. et al.*, Case No. 1:25-cv-02236-PK

Dear Judge Kuo:

We represent Defendants Chung Fat Supermarket Inc., Yue Mei Jiang, Xue Fen Jiang, and Xinyu Jiang (“Company Defendants”) in this action. We write pursuant to Your Honor’s Individual Rules IV to request an adjournment of the initial conference currently scheduled for July 2, 2025, and the associated deadlines in Your Honor’s April 24, 2025 Initial Conference Order.¹ Dkt. No. 7.

The reason for this request is that Plaintiff has not yet filed or served a Complaint on the Defendants. The Court has directed Plaintiff to serve a Complaint on or before July 21, 2025. *See* 6/16/2025 Dkt. Entry. Because no Complaint has been served, the parties are not in a position to discuss the issues related to the case or a schedule for the litigation. An initial conference is premature at this time.

Company Defendants request that an initial conference be adjourned until a time and date convenient to the Court after all Defendants’ time to answer, move, or otherwise respond to the Complaint has expired, and that the associated deadlines for the parties Rule 26(f) conference and to file a proposed discovery plan be adjourned accordingly. This is Company Defendants’ first request to adjourn the initial conference. Plaintiff consents to this request.

We thank the Court for its time and consideration of this request.

Sincerely,

/s/ *Kevin K. Yam*

Kevin K. Yam

¹ The Initial Conference Order requires the parties to meet and confer pursuant to Fed. R. Civ. P. 26 ten business days prior to the conference and to file a proposed discovery plan five days before the conference.